

# **Exhibit 3**



The *MASTERS*  
Law Firm *lc*

June 10, 2020

Lori Wetzel McCoy  
Wetzel County Circuit Clerk  
Wetzel County Courthouse  
Post Office Box 263  
200 Main Street  
New Martinsville, West Virginia 26155

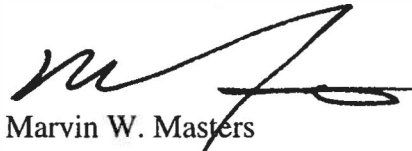
Dear Ms. McCoy:

Subject: Marcus Huey, et al., v. EQT Production Company, et al.  
Circuit Court of Wetzel County, West Virginia  
Civil Action No. 17-C-43

Please find "The Masters Law Firm lc's Reply to EQT's Response to Motion for Protective Order" enclosed for filing in the above subject civil action. A copy has this day been served upon counsel of record.

Thank you for your attention to this matter.

Very truly yours,



Marvin W. Masters

MWM:mmml

Enclosure

cc: Honorable Jeffrey Cramer  
Jennifer J. Hicks  
John F. McCuskey

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IN THE CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

MARCUS HUEY, et al.,

Plaintiffs,

v.

Civil Action No. 17-C-43  
Honorable Jeffrey Cramer

EQT PRODUCTION COMPANY, et al.,

Defendants.

**THE MASTERS LAW FIRM LC'S REPLY TO  
EOT'S RESPONSE TO MOTION FOR PROTECTIVE ORDER**

Now comes Marvin W. Masters and The Masters Law Firm lc, in reply to EQT's response to the undersigned and The Masters Law Firm lc's motion for protective order and motion to quash subpoena duces tecum. We reply as set out below:

The plaintiffs or some of them contacted this office to represent them related to EQT's payments, or lack thereof, for their natural gas holdings. Due to my schedule, neither I nor the law firm ever agreed to represent them, but while I was considering doing so, we were contacted and told that they had decided to hire John McCuskey. Our position is that neither I nor the law firm have the authority to disclose any information about communications to us due to the fact that the contact with us was in relationship of their search for an attorney to investigate and possibly represent them. I have not entered into a contract to represent them nor do I have any agreement, verbal or written, with John McCuskey or his law firm to assist or share in any proceeds of the above litigation. Neither am I the person who has or keeps the opt out records for the Hamric class action. I was lead attorney in that litigation, but the Claims Administrator keeps those records and

while I have the right to request to see them, EQT has the same right as we do. I have no record with respect to opt outs that would not be in the hands of the Administrator.

We are, therefore, bound by our ethical responsibilities to not turn over any document, or lack thereof, related to communications with this law firm based upon the plaintiffs' right to attorney-client privilege and work product privilege.

We, therefore, respectfully request the Court to grant our Motion for Protective Order and Motion to Quash the subpoena duces tecum.

Respectfully submitted,

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West Virginia State Bar No. 2359  
The Masters Law Firm le  
181 Summers Street  
Charleston, West Virginia 25301  
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IN THE CIRCUIT COURT OF WETZEL COUNTY, WEST VIRGINIA

MARCUS HUEY, et al.,

Plaintiffs,

v.

Civil Action No. 17-C-43  
Honorable Jeffrey Cramer

EQT PRODUCTION COMPANY, et al.,

Defendants.

**CERTIFICATE OF SERVICE**

I, Marvin W. Masters, do hereby certify that true and exact copies of the foregoing "The Masters Law Firm lc's Reply to EQT's Response to Motion for Protective Order" were served upon:

Jennifer J. Hicks (WV Bar No. 11423)  
Babst Calland, Clements & Zomnir, P.C.  
300 Summers Street, Suite 1000  
Charleston, West Virginia 25301  
*Counsel for Defendants*

John F. McCuskey (WV Bar No. 2431)  
Brian Warner (WV Bar No. 9372)  
Marc F. Mignault (WV Bar No. 12785)  
Shuman, McCuskey & Slicer PLLC  
1411 Virginia Street, East, Suite 200  
Charleston, West Virginia 25301  
*Counsel for Plaintiffs*

via electronic mail and in envelopes properly addressed, stamped and deposited in the regular course of the United States Mail this 10<sup>th</sup> day of June, 2020.

  
Marvin W. Masters  
West Virginia State Bar 2359